



# SHANNON & LEE LLP

## FEE STATEMENT

Internal # 16  
Date: 10/07/2022

700 Milam, Suite 1300  
Houston, Texas 77002  
United States

Free Speech Systems, LLC

### 00010-Free Speech Systems, LLC Debtor in Possession

#### Services

Date	Attorney	Description	Hours	Rate	Total
07/30/2022	KSL	Relief from Stay Proceedings: Handle requests from Marc Schwartz and team for copies of witness outlines, documents related to witness outline and cases relating to standard for lifting automatic stay to litigate in non-bankruptcy forum (.5)	0.50	\$850.00	\$425.00
07/31/2022	KSL	Relief from Stay Proceedings: Draft and finalize Witness and Exhibit List for Monday Hearing on Heslin\ Lewis Lift Stay Matter (1.0); review 5th Circuit Cases on standard for permitting litigation to be conducted in separate forum (1.0); prepare Q&A and revise same for Marc Schwartz in connection with Heslin\Lewis hearing (1.0); o/c with Marc Schwartz at LaMadeleine to review exhibits, cases on lift stay and standard for same for Marc Schwartz testimony at Heslin\Lewis Hearing (1.0)	4.00	\$850.00	\$3,400.00
07/31/2022	RJS	Relief from Stay Proceedings: Attention to emails from K. Lee re witness and exhibit list re stay motion re Heslin/Lewis matter (.2); revise same and prepare exhibits for filing (.5); file and serve same (.2); prepare legal argument re same (1.0).	1.90	\$625.00	\$1,187.50
08/01/2022	RJS	Relief from Stay Proceedings: Prepare for (.6) and attend (1.1) hearing re Debtor's stay motion re Heslin/ Lewis matter.	1.70	\$625.00	\$1,062.50
08/01/2022	RJS	Litigation: Attention to emails from N. Pattis re hearing scheduled in Connecticut litigation (.1); analyze order re same (.5); attend in person and Zoom call re same at M. Schwartz office (1.0).	1.60	\$625.00	\$1,000.00
08/01/2022	RJS	Relief from Stay Proceedings: Analyze Connecticut Plaintiffs lift-stay motion (.9); attention and respond to K. Lee emails re applicable law (.5); attention to N. Pattis email re estimate of cost for Connecticut	1.40	\$625.00	\$875.00

		litigation.			
08/01/2022	KSL	Relief from Stay Proceedings: Prepare for hearing on Lift Stay to Permit Heslin\Lewis suits to proceed to judgment (1.0); attend hearing and handle same with Marc Schwarz, CRO (1.5); post-hearing conference with counsel and CRO to discuss next steps in chapter 11 case (1.0); continue to work on researching and preparing response as to Curtis Factors in connection with Connecticut Plaintiffs' Motion to Lift Stay (2.0).	5.50	\$850.00	\$4,675.00
08/01/2022	KSL	Financing: Numerous t/c with S. Lemmon, counsel for PQPR, on various issues relating to use of cash collateral (.6); follow-up call with Marc Schwartz and counsel to discuss preparation for First Day Motions not handled on 8/1/22 (1.5)	2.10	\$850.00	\$1,785.00
08/02/2022	RJS	Litigation: Attention to email from K. Lee re hearing in Connecticut litigation (.1); attend video conference with K. Lee, M. Schwartz, and R. Battaglia re same (1.0); attention to email from C. Atkinson from Pattis & Smith re removal of Connecticut litigation in light of state court continuing action with Debtor as party and analyze drafts of removal papers (.5); attention to email from C. Atkinson of filed versions of same (.2); follow up teleconference with N. Pattis, K. Lee, R. Battaglia, and M. Schwartz re same (1.0).	2.80	\$625.00	\$1,750.00
08/02/2022	RJS	Relief from Stay Proceedings: Analyze Connecticut Plaintiffs' motion for relief from stay (.5); various emails with K. Lee and M. Schwartz re evidence required (.5); outline response re same (4.7).	5.70	\$625.00	\$3,562.50
08/02/2022	KSL	Litigation: Conference call with Conn. counsel to obtain update on timetable for jury selection, trial and cost figures (1.0); extended conference calls with counsel for Debtor, CRO and Schwartz Associates on preparing for First Day Hearings (3.0); continue to provide various inserts to First Day Orders and coordinate with Ray Battaglia on finalization of Utility, Critical Vendor, Extension of Time to File Schedules and Cash Collateral (1.0); review new issues raised by objectors as to use of cash collateral, and, provide responses to same (1.0); respond to and discuss issues raised by Texas and Conn Plaintiffs through Jarrod Martin and discuss with Ray Battaglia (1.5); respond to call from N. Pattis on whether there has been an extension of the automatic stay to Alex Jones (.5)	8.00	\$850.00	\$6,800.00
08/03/2022	RJS	Financing: Prepare for (1.0) and attend (7.0) hearing on use of cash collateral and other first-day motions; post-hearing meeting with M. Schwartz, K. Lee, and R. Battaglia (1.2).	9.20	\$625.00	\$5,750.00
08/03/2022	RJS	Relief from Stay Proceedings: Begin drafting response for motion for relief from automatic stay.	3.00	\$625.00	\$1,875.00

08/03/2022	KSL	Litigation: Review objections to First Day Motions and prepare responses to same for counsel and client (1.5); attend hearing on First Day Motions and hearing on First Day Motion to Use Cash Collateral of PQPR and discuss strategy and testimony with clients (7.0).	8.50	\$850.00	\$7,225.00
08/04/2022	RJS	Relief from Stay Proceedings: Continue drafting Motion for relief from automatic stay and conducting related research (5.0); draft witness and exhibit list re same (.4); send same to M. Schwartz, K. Lee, and R. Battaglia (.1); call re evidence for Connecticut Plaintiffs' lift stay motion (1.0); attention to email re Connecticut Plaintiffs' requested continuance of same and confirm agreement of Debtor (.1).	6.70	\$625.00	\$4,187.50
08/04/2022	KSL	Relief from Stay Proceedings: Analyze "cause" as set out in Conn. Plaintiffs' Emergency Motion to Lift Stay and discuss strategy on how to defend with CRO and co-counsel (1.5); t/c with S. Lemmon re: PQPR position on lift stay motion and budget (.5); review email stating that Connecticut Plaintiffs are continuing hearing on Emergency Motion to Lift Stay scheduled for August 5 to August 24 (.4).	2.40	\$850.00	\$2,040.00
08/04/2022	KSL	Fee/Employment Applications: Begin editing and revising Application to Employ Shannon & Lee LLP, especially the Declaration and connections wto InfoW bankruptcy cases (2.0); edit and revise Application to retain CRO and Schwartz Associates as advisors for CRO (1.0).	3.00	\$850.00	\$2,550.00
08/05/2022	RJS	Financing: Attention to J. Martin email re FSS company agreement (.1); draft response to same with attached documents (.5).	0.60	\$625.00	\$375.00
08/05/2022	RJS	Claims Administration and Objections: Analyze A. Jones proof of claim filed in Bankruptcy case (.1); review relevant documents for contractual indemnity (.9); draft email to M. Schwartz, K. Lee, and M. Schwartz re same (.1).	1.10	\$625.00	\$687.50
08/05/2022	RJS	Litigation: Attention to order of U.S. Bankruptcy Court for the District of Connecticut order setting hearing on Connecticut Plaintiffs' motion for remand on expedited basis (.2); outline response to same and motion for withdrawal of reference (3.3).	3.50	\$625.00	\$2,187.50
08/05/2022	KSL	Litigation: Handle drafting of Suggestions of Bankruptcy for A. Reynal in appellate and state court actions (.5); analyze and document state court evidence of values by Expert Witness Pettingill on FSS Values (1.0).	1.50	\$850.00	\$1,275.00
08/05/2022	KSL	Fee/Employment Applications: Analyze issues relating to Applications for CRO and Schwartz Associates (1.0).	1.00	\$850.00	\$850.00
08/06/2022	RJS	Claims Administration and Objections: Attention to verdict on punitive damages and research Texas caps	1.50	\$625.00	\$937.50

		re same (1.3); draft email to K. Lee and R. Battaglia re same (.2).			
08/06/2022	RJS	Litigation: Draft motion for pro hac vice for Connecticut bankruptcy court re removed Connecticut litigation (.9); draft motion for to withdrawal of the reference re same (2.5); analyze Connecticut Plaintiffs' motion to remand and draft response to same (5.6); draft email to M. Schwartz, K. Lee, N. Pattis, and R. Battaglia re same (.1).	9.30	\$625.00	\$5,812.50
08/06/2022	KSL	Fee/Employment Applications: Review comments provided by M. Schwartz to Application (.2); review and analyze new sections for Declaration iso Application to Retain and disclosures relating to InfoW (.8)	1.00	\$850.00	\$850.00
08/07/2022	RJS	Litigation: Updated pro hac vice application, motion to withdraw the reference, and response to motion to remand re Connecticut Litigation in response to K. Lee and R. Battaglia comments (1.5).	1.50	\$625.00	\$937.50
08/07/2022	RJS	Business Operations: Attention and respond to M. Schwartz emails re inventory issues (.3).	0.30	\$625.00	\$187.50
08/07/2022	KSL	Litigation: Work on building base case pleading for Motion to Withdraw the Reference to the District Court in Connecticut (2.0); edit and revise Pro Hac for RJ Shannon (.3); review and edit Response to Motion to Remand (1.0)	3.30	\$850.00	\$2,805.00
08/08/2022	RJS	Litigation: Call with N. Pattis re pleadings to file in Connecticut litigation (.1); draft email re visiting attorney application re same (.1); finalize motion to withdraw the reference and response to motion for remand re same (1.5); send same to N. Pattis and staff (.1); two calls with N. Pattis staff re filing of same (.1); confirm filing of same (.1); call with M. Schwartz, K. Lee, R. Battaglia, and N. Pattis re same (.5).	2.40	\$625.00	\$1,500.00
08/08/2022	RJS	Case Administration: Daily status call with M. Schwartz, K. Lee, R. Battaglia, with S. Jordan attending for part of call.	1.00	\$625.00	\$625.00
08/08/2022	KSL	Case Administration: Numerous t/cs with R. Battaglia, Norm Pattis, R. Shannon and M. Schwartz to discuss operational issues at FSS, retention issues with Connecticut counsel, and backlog on fulfillment of orders and additional cash collateral needed to complete same (1.5); extended call on daily FSS Team meeting to discuss issues on chapter 11 process and action plan (1.0).	2.00	\$850.00	\$1,700.00
08/08/2022	KSL	Litigation: Review of expert witness Pettingill's testimony in Heslin/Lewis Suit re valuation of FSS and methodology behind his opinion (.5).	0.50	\$850.00	\$425.00
08/09/2022	RJS	Litigation: Travel to Connecticut for 08/10/2022	6.50	\$312.50	\$2,031.25

		expedited hearing on Connecticut Plaintiffs' motion to remand (1/2 rate for non-working travel time).			
08/09/2022	RJS	Relief from Stay Proceedings: Attention to email from ADP re intention to terminate payroll services and respond to same.	0.20	\$625.00	\$125.00
08/09/2022	KSL	Business Operations: Work with Marc Schwartz and Ray Battaglia to understand extent of "backlog" issue and determine most appropriate solution (1.5); t/c with Norm Pattis to determine dislocation of Alex Jones with a Connecticut trial on his ability to do show and create sales for FSS (.5); extended call with FSS Team and Shelby Jordan, counsel for Alex Jones, on funding of fulfilling back orders and necessity for Alex Jones to be in Connecticut and absent from studio during Connecticut trial (1.0).	3.00	\$850.00	\$2,550.00
08/09/2022	KSL	Case Administration: Extended daily call with FSS Team to discuss daily assignments and action items requiring attention (1.0).	1.00	\$850.00	\$850.00
08/09/2022	KSL	Fee/Employment Applications: Continue to review and make additional edits to Application to Retain CRO, Declaration of Marc Schwartz, Application to Retain S&L and Declaration of Kyung S. Lee (2.0).	2.00	\$850.00	\$1,700.00
08/10/2022	RJS	Litigation: Calls with K. Lee re hearing on motion to remand re Connecticut Litigation (.2); prepare for hearing (2.3); call with N. Pattis re motion to continue filed by Connecticut Plaintiffs and attention to filing of same on docket (.2); call with K. Lee after hearing continued after traveling to vicinity of Bridgeport, Connecticut bankruptcy court (.1); call with N. Pattis after conclusion of disciplinary proceeding in Connecticut Superior Court related to Connecticut Plaintiffs' claims (.1); attention to filing by N. Pattis in Connecticut Bankruptcy Court and email M. Schwartz, K. Lee, and R. Battaglia about authorization (.2).	3.10	\$625.00	\$1,937.50
08/10/2022	RJS	Litigation: Travel from Windsor Locks, Connecticut to Pattis & Smith office in Newport, Connecticut in advance of hearing in Bridgeport, Connecticut, confirm hearing had been continued to 8/12/22, and return to Windsor Locks(1/2 non-working travel rate).	2.00	\$312.50	\$625.00
08/10/2022	RJS	Litigation: Travel time related to return rental car and proceed to Hartford, CT airport for return flight to Houston prior to delay and ultimate cancelation of flight due to storms in DC area and Houston (1/2 travel time).	2.80	\$312.50	\$875.00
08/10/2022	KSL	Litigation: T/c with R. Shannon to discuss arguments in Connecticut on Motions to Remand and response to same (.5); conference call with FSS Team to determine division of work and action plan of items to handle for FSS in Texas and Connecticut (1.0).	1.50	\$850.00	\$1,275.00

08/10/2022	KSL	Financing: Numerous t/cs with S. Lemmon to update on negotiations over cash collateral and discovery propounded by Plaintiffs' counsel (.8).	0.80	\$850.00	\$680.00
08/10/2022	KSL	Business Operations: Conference calls with M. Schwartz, C. Schwartz and Ray Battaglia on issues relating to fulfillment and backlog of shipping orders (1.0); conference call to review status of ADP proposed termination of FSS as client and whether alternative third-party administrator is required for FSS (1.0); continue to obtain facts and approaches to solving backlog and fulfillment issues at FSS and its dealings with Blue Asension Logistics, LLC (2.0).	4.00	\$850.00	\$3,400.00
08/11/2022	RJS	Litigation: Travel time to return to Houston from Connecticut (1/2 rate non-working travel).	6.50	\$625.00	\$4,062.50
08/11/2022	KSL	Case Administration: Draft, edit, and file notice of appearance for case (.5).	0.50	\$850.00	\$425.00
08/11/2022	KSL	Financing: Contact R. Saldana to determine availability of court to hear emergency motion to amend cash collateral order (.5); review fulfillment issue, cash collateral required in order to overcome backlog, factoring arrangement between Blue Asension and Alex Jones, extent of backlog and handle issues relating to handling same without affecting credit card processor and bank relating to same (3.0); numerous conference calls to discuss fulfillment issue and cash collateral amendment required (2.0); assist R. Battaglia in preparing for hearing on amendment to cash collateral hearing with drafts of Witness and Exhibit List, strategy considerations, topical areas to cover with both Patrick Riley and Marc Schwartz (2.0).	7.50	\$850.00	\$6,375.00
08/12/2022	RJS	Litigation: Prepare for (2.0); and attend (.7) remote hearing in Connecticut Bankruptcy Court re motion for remand; call with K. Lee re outcome of same (.1); respond to S. Jordan email re same (.1).	2.90	\$625.00	\$1,812.50
08/12/2022	RJS	Financing: Prepare for (.2) and attend (4.1) hearing on motion to amend interim cash collateral order.	4.30	\$625.00	\$2,687.50
08/12/2022	KSL	Financing: Prepare for hearings on amendment to cash collateral order and assist R. Battaglia in presentation of case and assist in cross-examination of witnesses (2.0); emails on negotiations with Plaintiffs counsel, subchapter v trustee and US Trustee on cash collateral amendment and issues relating to fulfillment and Blue Asension agreement (1.0); assist in preparation of witnesses Marc Schwartz and Patrick Riley by Ray Battaglia (1.5); assist Ray Battaglia at hearing on Emergency Motion to Amend Cash Collateral, review exhibits and formulate objections to admission of same to Objector's exhibits, and analyze revised 13 week budget and attend hearing by video (3.5); post-hearing discussions with M. Schwartz to make sure all issues	8.30	\$850.00	\$7,055.00

		covered(.3)			
08/13/2022	RJS	Litigation: Review discovery request from plaintiffs and gather relevant documents from email.	3.10	\$625.00	\$1,937.50
08/15/2022	KSL	Litigation: Conference call with FSS Team to discuss issues relating to discovery, Connecticut Plaintiffs Emergency Motion to Lift Stay, Connecticut litigation and status of remand (1.0); Zoom call to discuss issues relating to extension of the automatic stay, the necessity of Alex Jones on the air, the effect it will have on FSS sales and testimony required at hearing on same (1.5)	2.50	\$850.00	\$2,125.00
08/15/2022	RJS	Fee/Employment Applications: Review application to employ drafted by K. Lee (.3); Revise and comments to application to employ S&L (2.2).	2.50	\$625.00	\$1,562.50
08/15/2022	RJS	Case Administration: Attend daily status call re matter.	0.50	\$625.00	\$312.50
08/15/2022	RJS	Meetings of Creditors: Call with Steve Lemmon appended to daily status call.	0.30	\$625.00	\$187.50
08/15/2022	RJS	Litigation: Gather emails re disciplinary hearing of N. Pattis and A. Reynal related to estate's potential retention of attorneys for Connecticut litigation (1.0); send same to K. Lee for submission to Connecticut disciplinary counsel (.1); calls with K. Lee re same (.2).	1.30	\$625.00	\$812.50
08/15/2022	RJS	Litigation: Attention to order of remand of removed Connecticut Litigation (.2); attention and response to K. Lee email re appeal/other action with respect to remand order or extension of automatic stay requested by S. Jordan (.3).	0.50	\$625.00	\$312.50
08/16/2022	KSL	Litigation: Respond to emails and undertake analysis relating to extension of the automatic stay, the requirements for such extension under 5th Circuit law, Divine Ripe and cases discussed (2.0); interview Fulfillment Expert from Fort Worth Texas and follow-up with M. Schwartz (1.0).	3.00	\$850.00	\$2,550.00
08/16/2022	RJS	Litigation: Attention to, research regarding, and detailed response to email from S. Jordan re appeal/other action in response to the order remanding removed Connecticut litigation (2.0); draft follow up email re same proposing path forward allowing Connecticut litigation to continue (.8).	2.80	\$625.00	\$1,750.00
08/16/2022	RJS	Financing: Attend teleconference with potential expert regarding Blue Asension in connection with Debtor's request for use of cash collateral with K. Lee, M. Schwartz, and C. Schwartz and draft emails to M. Schwartz during teleconference.	1.00	\$625.00	\$625.00
08/16/2022	RJS	Case Administration: Attend daily status call re matter.	0.50	\$625.00	\$312.50
08/16/2022	RJS	Relief from Stay Proceedings: Research and case	3.30	\$625.00	\$2,062.50



		analysis re extension of the automatic stay to A. Jones in Connecticut litigation requested by S. Jordan (2.5); draft detailed email responding to K. Lee email re same (.6); draft follow up email re same issue for remaining Texas litigation (.2).			
08/16/2022	RJS	Fee/Employment Applications: Finalize comments to application to employ S&L as co-counsel to the Debtor (.6); confirm computerized connections search re K. Lee declaration (no charge); draft email to S. Lee re same (.1).	0.70	\$625.00	\$437.50
08/16/2022	KSL	Case Administration: Attend daily call to discuss status of Emergency Motion to Lift Stay and Emergency Motion to use Cash Collateral (1.0).	1.00	\$850.00	\$850.00
08/16/2022	KSL	Fee/Employment Applications: Edit and revise draft Application to Retain CRO and Declaration of Marc Schwartz and circulate for review (1.0); review and revise Application to Retain S&L and Declaration of Kyung S. Lee (1.0).	2.00	\$850.00	\$1,700.00
08/16/2022	KSL	Financing: Several phone calls to S. Lemmon to discuss status of cash collateral order negotiations, new PQPR issues and discovery of PQPR documents (.6).	0.60	\$850.00	\$510.00
08/17/2022	KSL	Litigation: Numerous t/c with S. Jordan, counsel for Alex Jones, on issues relating to Connecticut Action (.5).	0.50	\$850.00	\$425.00
08/17/2022	RJS	Fee/Employment Applications: Research need for application to employ testifying expert re Blue Asencion (.7); draft email re same to M. Schwartz, C. Schwartz, and K. Lee (.1); revise J. Michaels engagement letter as counter proposal (.8); draft email re changes to M. Schwartz, C. Schwartz, and K. Lee re same (.1).	1.70	\$625.00	\$1,062.50
08/17/2022	RJS	Relief from Stay Proceedings: Revise response to Connecticut Plaintiffs' lift stay motion (3.8); incorporate comments re same (1.2); finalize response to Connecticut Plaintiffs' lift stay motion (.5); file and serve same (.4); draft email re availability of FSS employee witnesses in Connecticut litigation proceeding against A. Jones only to M. Schwartz, C. Schwartz, R. Battaglia, and K. Lee (.3).	6.20	\$625.00	\$3,875.00
08/17/2022	RJS	Case Administration: Attend daily status call re matter.	0.50	\$625.00	\$312.50
08/17/2022	KSL	Relief from Stay Proceedings: T/c with R. Battaglia, M. Schwartz and R. Shannon on various issues relating to Emergency Motion to Lift Stay by Connecticut Plaintiffs (1.0); review and edit final version of FSS Response to Emergency Motion to Lift Stay (1.0).	2.00	\$850.00	\$1,700.00
08/17/2022	KSL	Business Operations: Conference call with CR3 Partners and Ray Battaglia to retain loss revenue due	1.40	\$850.00	\$1,190.00



		to unavailability of Alex Jones and fulfillment process at Blue Asension (1.0); t/c with S. Lemmon, counsel for PQPR, on issues relating to products shipped and not paid for by FSS pre-petition (.4).			
08/17/2022	KSL	Fee/Employment Applications: Review and revise final versions of Applications to Retain S&L and CRO (1.5)	1.50	\$850.00	\$1,275.00
08/18/2022	KSL	Fee/Employment Applications: Locate executed engagement letters for R. Shannon re: completion of Applications to Employ (.3).	0.30	\$850.00	\$255.00
08/18/2022	RJS	Relief from Stay Proceedings: Email to K. Lee re case law re S. Jordan request to extend automatic stay to A. Jones (.4); outline proposal of potential resolution of Connecticut Plaintiffs lift stay motion in advance of daily status call (.5); teleconference with N. Pattis, S. Jordan, M. Schwartz, R. Battaglia, and K. Lee re Connecticut litigation and stay (.8); update proposal drafted previously and send same to R. Battaglia (.1).	1.80	\$625.00	\$1,125.00
08/18/2022	RJS	Case Administration: Attend daily status call re matter.	1.00	\$625.00	\$625.00
08/18/2022	RJS	Fee/Employment Applications: Email to K. Lee re executed copy of S&L engagement letter (.1); revise applications to employ CRO and S&L (1.8); prepare proposed final versions of same and draft email to M. Schwartz re for review, approval, and signature (.2).	2.10	\$625.00	\$1,312.50
08/18/2022	KSL	Relief from Stay Proceedings: Numerous emails and discussions with R. Shannon on whether Fifth Circuit law allows extension of the automatic stay without identity of interest under Divine Ripe (1.0); extended conference call with Norm Pattis and FSS Team to discuss proof for Emergency Motion to Lift Stay filed by Conn Plaintiffs (1.0); conference call with lost revenue expert and FSS Team in anticipation of hearing on Lift Stay Motion (1.0); conference call with FSS Team to discuss outline of topics to handle, strategy on lift stay and handling of issues relating to Connecticut and Texas trial dates in August and September 2022 (2.0); analyze issues relating to whether the FSS Company Agreement and any amendment provides for indemnification of member and manager (.5); analyze whether by operation of law a manager and member are entitled to indemnification as a matter of Texas law (1.0).	6.50	\$850.00	\$5,525.00
08/18/2022	KSL	Financing: Numerous t/cs with S. Lemmon to discuss status of negotiations on cash collateral and discovery with Plaintiffs (.5).	0.50	\$850.00	\$425.00
08/19/2022	KSL	Relief from Stay Proceedings: Outline issues raised in Emergency Motion to Lift Stay and responses to same in preparation for witness outlines (1.5).	1.50	\$850.00	\$1,275.00
08/19/2022	RJS	Fee/Employment Applications: Review, revise, and	1.40	\$625.00	\$875.00

		prepare proposed final version of R. Battaglia application to employ (.7); draft email to R. Battaglia re same (.1); draft email to M. Schwartz re proposed final versions of applications to employ (.1); attention and respond to K. Lee email re draft engagement letter for Pattis & Smith LLC (.2); attention and respond to K. Lee email re captions for Connecticut litigation in connection with application to employ Pattis & Smith LLC (.2); attention and respond to various emails with K. Lee re same (.1).			
08/19/2022	RJS	Relief from Stay Proceedings: Research compliance of Connecticut state court procedure with the automatic stay (1.8); draft email to K. Lee re same (.2).	2.00	\$625.00	\$1,250.00
08/19/2022	RJS	Case Administration: Attend daily status call re matter.	0.50	\$625.00	\$312.50
08/19/2022	KSL	Case Administration: Extended conference call with FSS Team on daily call to determine status of various projects and work plan (1.0); numerous t/cs with Ray Battaglia, Norm Pattis, Andino Reynal, S. Lemmon, Marc Schwartz and R. Shannon on comments to retention pleadings, cash collateral order and budget, new product sale issues, and matters related to defense of the Connecticut Plaintiffs' Emergency Motion to Lift the Automatic Stay (.5).	1.50	\$850.00	\$1,275.00
08/19/2022	KSL	Fee/Employment Applications: Work on creating and revising retention pleadings, editing engagement letters, disclosures and forms of orders for Pattis & Smith on a flat fee basis and Reynal Law Firm on an hourly basis as special counsel for FSS in Connecticut litigation (4.0).	4.00	\$850.00	\$3,400.00
08/20/2022	RJS	Fee/Employment Applications: Final review applications to employ CRO, The Law Offices of Ray Battaglia, and Shannon & Lee LLP prior to filing (.3); finalize, file, and serve same (.5).	0.80	\$625.00	\$500.00
08/21/2022	KSL	Relief from Stay Proceedings: Arrange for calls among FSS professionals and Alex Jones team to discuss status of negotiations and agreements on cash collateral motion and Conn Plaintiffs' Emergency Motion to Lift Stay (.5); analyze issues on negotiations over the Lift Stay and discuss provisions acceptable to N. Pattis to allow representation of FSS and necessity of Pattis & Smith to the agreements (.5).	1.00	\$850.00	\$850.00
08/21/2022	RJS	Relief from Stay Proceedings: Teleconference with M. Schwartz, K. Lee, R. Battaglia, and S. Jordan re resolution of AEJ issues with agreement to Connecticut lift stay motion and retention of state court counsel (.5); follow up call re same with A. Reynal and N. Pattis present (.7).	1.20	\$625.00	\$750.00
08/21/2022	KSL	Relief from Stay Proceedings: Extended calls among FSS professionals, proposed state court litigation	1.00	\$850.00	\$850.00

		counsel, and J. Jordan to discuss resolution of Alex Jones issues regarding Connecticut Lift Stay Motion and retention of state court counsel (1.0).			
08/21/2022	KSL	Fee/Employment Applications: Work on editing various pleadings and retention letters reflecting changes as a result of calls and updates from parties (2.0).	2.00	\$850.00	\$1,700.00
08/22/2022	KSL	Fee/Employment Applications: Edit and revise comments and formula for compensating Connecticut and Texas state court litigation counsel by editing and revising retention agreement, Emergency Applications, Rule 2014 Disclosures and forms of orders (4.0).	4.00	\$850.00	\$3,400.00
08/22/2022	RJS	Case Administration: Attend daily status call re matter including preliminary views of J. Michels re Blue Asension.	0.50	\$625.00	\$312.50
08/22/2022	RJS	Fee/Employment Applications: Provide comments to K. Lee draft application to employ Pattis & Smith (.5); teleconferences with N. Pattis and A. Reynal re draft applications to employ same (1.0).	1.50	\$625.00	\$937.50
08/22/2022	KSL	Relief from Stay Proceedings: Extended call with FSS Team to discuss issues relating to Cash Collateral Order and Lfit Stay Matter (1.0); numerous conference calls with co-counsel, CRO, State Court counsel and opposing counsel on Stay Lift Motion and issues relating to retention of state court counsel (2.0).	3.00	\$850.00	\$2,550.00
08/23/2022	RJS	Case Administration: Attend daily status call re matter.	0.50	\$625.00	\$312.50
08/23/2022	RJS	Relief from Stay Proceedings: Attention and respond to various emails re stipulation further abating requirement to file W&E list, finalize same, and file and serve same (.5); teleconference with M. Schwartz, R. Battaglia, and K. Lee re Connecticut Plaintiffs comments to proposed agreed order (.6); teleconference with R. Chapple re same (.2); provide Debtor comments to proposed order to R. Chapple re same (.1).	1.40	\$625.00	\$875.00
08/23/2022	RJS	Fee/Employment Applications: Review and finalize applications to employ Pattis & Smith and the Reynal Law firm (1.1); file and serve same (.5).	1.60	\$625.00	\$1,000.00
08/23/2022	KSL	Fee/Employment Applications: Edit and revise comments and formula for compensating Connecticut and Texas state court litigation counsel by editing and revising retention agreement, Emergency Applications, Rule 2014 Disclosures and forms of orders (3.0).	3.00	\$850.00	\$2,550.00
08/23/2022	KSL	Relief from Stay Proceedings: Extended call with FSS Team to discuss issues relating to Cash Collateral Order and Lift Stay Matter (1.0); extended call with FSS Team to discuss issues relating to Cash Collateral Order and Lift Stay Matter (1.0); numerous conference calls with co-counsel, CRO, State Court counsel and	5.00	\$850.00	\$4,250.00

		opposing counsel on Lift Stay Motion and issues relating to retention of state court counsel (2.0); edit and file order on extending deadlines to file Witness and Exhibit List for Lift Stay Motion (1.0).			
08/24/2022	RJS	Relief from Stay Proceedings: Attention and respond to K. Lee emails re lift stay motion (.2); attend part of hearing on lift stay motion after conflicting hearing concluded (.2); draft notice of continued hearing re lift stay motion and applications to employ (.5); file and serve same (.3); draft email to R. Chapple re inclusion of lift stay motion in notice along with the applications to employ (.1); teleconference re lift stay issues (1.0).	2.30	\$625.00	\$1,437.50
08/24/2022	RJS	Fee/Employment Applications: Conduct research into UST comments about potential causes of action against state court counsel in connection with applications to employ Pattis and Reynal (.2); draft email to K. Lee, M. Schwartz, R. Battaglia, and S. Jordan re same (.1).	0.30	\$625.00	\$187.50
08/24/2022	KSL	Relief from Stay Proceedings: Prepare notes for meetings with Marc Schwartz and court in connection with Lift Stay Motion and Cash Collateral Extension Motion (1.0); breakfast meeting with M. Schwartz on same (1.0); handle portions of hearing relating to FSS on Lift Stay Motion (1.0).	3.00	\$850.00	\$2,550.00
08/24/2022	KSL	Fee/Employment Applications: Handle dialogue and exchange of data relating to agreements, terms and conditions of retaining special counsel for Connecticut and Texas litigation (3.0).	3.00	\$850.00	\$2,550.00
08/24/2022	KSL	Meetings of Creditors: Discuss with counsel for interested parties latest developments on case issues with client and co-counsel (1.5).	1.50	\$850.00	\$1,275.00
08/25/2022	RJS	Fee/Employment Applications: Various emails with K. Lee and team re information requested by UST re applications to employ Pattis and Reynal.	0.50	\$625.00	\$312.50
08/25/2022	RJS	Financing: Review communications and documents re Plaintiffs requests for production re cash collateral (2.5); prepare privilege log re same (.5); prepare shell response and send same to R. Battaglia (.5.).	3.50	\$625.00	\$2,187.50
08/25/2022	RJS	Case Administration: Attend daily status call re matter (.5); attention to and analysis of motion to appoint tort committee and remove Debtor as DIP (3.7); draft email to Plaintiffs' counsel re exhibits attached to motion (.1).	4.30	\$625.00	\$2,687.50
08/25/2022	KSL	Fee/Employment Applications: Revise and edit Amended Declarations for Pattis and Reynal (1.0); revise and edit engagement letters for Reynal and Pattis (1.0); negotiate with Alex Jones over the share of fees to be borne by Alex Jones as to special counsel fees (1.0)	3.00	\$850.00	\$2,550.00

08/26/2022	RJS	Case Administration: Attend daily status call re matter (.5); draft proposed written discovery on Plaintiffs re motion for tort claimants committee/remove DIP (4.1); draft response to motion to expedite same (6.3).	10.90	\$625.00	\$6,812.50
08/26/2022	RJS	Relief from Stay Proceedings: Attention to emails re Ally Auto repossessing Tahoe (.1); search docket to confirm service on Ally Auto and send proof of same to team (.3); prepare witness and exhibit list for August 29 hearing (1.3); finalize and file same (.5).	2.20	\$625.00	\$1,375.00
08/26/2022	RJS	Fee/Employment Applications: Review and provide comments/revisions to updated declaration of N. Pattis and A. Reynal.	0.20	\$625.00	\$125.00
08/26/2022	KSL	Case Administration: Prepare for and attend FSS Daily Team call to coordinate activities for CRO of FSS (1.5); analyze action items requiring attention over Labor Day weekend for FSS (1.0).	3.50	\$850.00	\$2,975.00
08/26/2022	KSL	Fee/Employment Applications: Handle issues relating to amendments for the Declarations for new special counsel firms (1.0); analyze action items requiring attention over Labor Day weekend for FSS (1.0).	2.00	\$850.00	\$1,700.00
08/27/2022	KSL	Case Administration: Undertake initial research and prepare first draft of Response to Motion to Expedite (1.0) (reduced to 1 hour from 5 to avoid duplication with RJ Shannon work on project previously started).	1.00	\$850.00	\$850.00
08/27/2022	RJS	Relief from Stay Proceedings: Respond to various emails to N. Pattis re effect of automatic stay on the Connecticut proceeding absent agreed order (.5); draft emails to S. Jordan re A. Jones agreement to paragraphs of proposed order re Connecticut Plaintiffs' motion for relief from stay (.1).	0.60	\$625.00	\$375.00
08/27/2022	RJS	Case Administration: Status call re negotiations re lift stay and applications to employ (.5); call with M. Haselden re matter and PQPR request for investigation (.2); follow-up call among M. Haselden, S. Lemmon, R. Battaglia, and K. Lee re same (.4); incorporate comments from K. Lee and R. Battaglia into response to Motion to Expedite Plaintiffs' motion for tort claimants committee/removal of DIP (3.2).	4.30	\$625.00	\$2,687.50
08/27/2022	KSL	Fee/Employment Applications: Work on revising Amended Disclosures for Special Counsel and gathering facts relating to each firm's payment and amendments from original agreement (3.0).	3.00	\$850.00	\$2,550.00
08/27/2022	KSL	Relief from Stay Proceedings: Numerous conferences with R. Battaglia on issues relating to Lift Stay Motion agreement and negotiations relating to same (.5); coordinate with Connecticut counsel and R. Battaglia issues to be negotiated with opposing counsel on Lift Stay Motion (1.5); consult CRO on various outstanding	3.50	\$850.00	\$2,975.00

		issues and walk him through the overlap of issues on retention and Lift Stay Agreement (.5); Zoom call to discuss status of negotiations and outstanding asks from parties (1.0).			
08/28/2022	KSL	Fee/Employment Applications: Work on multiple revisions to the retention orders for special counsel Pattis & Smith and The Reynal Firm (1.0); communicate with CRO and special counsel on forms of order and revisions thereto (.5); handle Amended Declaration to reflect corrections and necessary updates to Declarations (1.5); update US Trustee and negotiate with same on forms of orders for retention of Pattis and Reynal Firm (1.0).	4.00	\$850.00	\$3,400.00
08/28/2022	RJS	Case Administration: Further incorporate comments to response to motion to expedite Plaintiffs' motion for tort claimants committee (4.0); detailed read through and revisions to the same (2.3); finalize, file, and serve same (.5).	6.80	\$625.00	\$4,250.00
08/28/2022	KSL	Case Administration: Work on multiple edits and revisions to draft of Response to Motion to Expedite filed by the Conn Plaintiffs (3.0); numerous t/c with R. Battaglia to discuss sections in the Response (.4).	3.40	\$850.00	\$2,890.00
08/28/2022	KSL	Financing: Conference with S. Lemmon and M. Schwartz to discuss clawback capacity re PQPR (.5).	0.50	\$850.00	\$425.00
08/29/2022	RJS	Relief from Stay Proceedings: Prepare for (1.5) and attend (.6) hearing re lift stay motion and applications to employ Pattis and Reynal.	2.10	\$625.00	\$1,312.50
08/29/2022	RJS	Case Administration: Attend daily status call re matter (.5); review and finalize schedules through in person conference with M. Schwartz and K. Lee and various emails with same and R. Battaglia (6.5); file same (.4).	7.40	\$625.00	\$4,625.00
08/29/2022	KSL	Fee/Employment Applications: Edit and revise retention orders for Special Counsel for Pattis & Smith and The Reynal Firm (1.0); review issues on retention of special counsel with US Trustee and objecting creditors (1.0); analyze issues for hearing with Marc Schwartz (.5); handle matters at the scheduled hearing on Motion to Lift Stay and Retention of Special Counsel (1.0).	3.50	\$850.00	\$2,975.00
08/29/2022	KSL	Case Administration: Work on comments to IDI draft and to drafts of Schedules and SOFA (2.0).	2.00	\$850.00	\$1,700.00
08/30/2022	RJS	Case Administration: Attend daily status call (.5); outline notes re response to Plaintiffs' motion for tort claimants committee/remove DIP (1.0).	1.50	\$625.00	\$937.50
08/30/2022	RJS	Plan and Disclosure Statement: Various emails with K. Lee re beginning drafting plan of reorganization.	0.50	\$625.00	\$312.50
08/30/2022	KSL	Case Administration: Review and analyze IDI answers	2.50	\$850.00	\$2,125.00

		with M. Schwartz and prepare for and handle IDI with US Trustee's office (2.5).			
08/30/2022	KSL	Fee/Employment Applications: Handle further amendments and changes to any orders and agreements with respect to retention of Chris Martin as appellate counsel, including amending engagement letter and Application, Declaration and form of order (2.0).	2.00	\$850.00	\$1,700.00
08/30/2022	KSL	Litigation: Assist N. Pattis with issues in connection with starting trial in Connecticut (1.0); analyze issues relating to PQPR involvement in case and discovery (1.5)	2.50	\$850.00	\$2,125.00
08/31/2022	RJS	Case Administration: Attend daily status call re matter.	0.50	\$625.00	\$312.50
08/31/2022	RJS	Litigation: Prepare various documents related to removal of cases in InfoW cases in connection with Plaintiffs' request for sanctions in Connecticut Litigation.	0.70	\$625.00	\$437.50
08/31/2022	KSL	Fee/Employment Applications: Continue to edit, revise and negotiate Chris Martin engagement letter and application with firm and counsel for Alex Jones (2.0).	2.00	\$850.00	\$1,700.00
08/31/2022	KSL	Case Administration: Analyze issues relating to whether the subchapter v trustee should investigate versus Tort Committee and analyze subchapter V cases of Corinthian on same (3.0).	3.00	\$850.00	\$2,550.00
09/01/2022	KSL	Litigation: Review response by PQPR and issues relating to use of incorrect term for Sandy Hook Plaintiffs and communications with counsel regarding same (1.5).	1.50	\$850.00	\$1,275.00
09/01/2022	KSL	Business Operations: Handle issues relating to emails from M. Randazza on claims arising from depositions, issues from reporters and handling of PQPR business issues (1.0); conference call among FSS business and legal to discuss developments in the case (1.0)	2.00	\$850.00	\$1,700.00
09/01/2022	KSL	Plan and Disclosure Statement: Collect cases and update M. Schwartz on "disposable income" definition to assist in modeling 3-5 year forecasts (1.0)	1.00	\$850.00	\$850.00
09/01/2022	RJS	Plan and Disclosure Statement: Draft detailed email to K. Lee and R. Battaglia about limits of common interest privilege and applicability to bankruptcy and plan negotiations.	0.80	\$625.00	\$500.00
09/02/2022	RJS	Case Administration: Draft email to K. Lee re timing of matters (.1); attend daily status call (.5).	0.60	\$625.00	\$375.00
09/02/2022	KSL	Litigation: Gather data and paper on preference payment made to Bankston and the Texas Plaintiffs (.5); analyze and gather data on recovery actions against PQPR (1.0).	1.50	\$850.00	\$1,275.00



09/02/2022	KSL	Case Administration: Draft, circulate and edit Motion to Compel Compliance with Bankruptcy Rule 2019 (2.5)	2.50	\$850.00	\$2,125.00
09/02/2022	KSL	Relief from Stay Proceedings: Follow-up on issues relating to ADP (.3).	0.30	\$850.00	\$255.00
09/02/2022	KSL	Case Administration: Draft, circulate and edit Motion to Compel Compliance with Bankruptcy Rule 2019 (2.5);	2.50	\$850.00	\$2,125.00
09/02/2022	RJS	Plan and Disclosure Statement: Draft email to K. Lee re projected disposable income calculation in subchapter v cases.	0.20	\$625.00	\$125.00
09/02/2022	RJS	Litigation: Revise written discovery requests re motion to appoint TCC and remove DIP (.3); draft email to K. Lee re same (.1); attention and respond to K. Lee email re exhibits to TCC motion (.2).	0.60	\$625.00	\$375.00
09/02/2022	RJS	Fee/Employment Applications: Attention to K. Lee draft of Interim Compensation Motion (.2); draft email re service of same (.1).	0.30	\$625.00	\$187.50
09/03/2022	RJS	Litigation: Attention and respond to emails from K. Lee re claims and avoidance actions (.2); follow up emails re particular potential avoidance actions and applicability of section 502(d) (.3).	0.50	\$625.00	\$312.50
09/03/2022	KSL	Business Operations: Study and analyze M. Schwartz term sheet from [REDACTED] outlining \$500,000 per week additional consignment financing agreement bullet points prepared by M. Schwartz (2.0); edit and revise first draft of Consignment and Financing Agreement (1.0); conference call with M. Schwartz and S. Jordan to discuss Consignment Agreement (.5)	3.50	\$850.00	\$2,975.00
09/04/2022	RJS	Litigation: Attention to emails re certified copies of bankruptcy documents for litigation (.1); request same from the Clerk of Court (.2).	0.30	\$625.00	\$187.50
09/04/2022	KSL	Litigation: Review and gather certain financial data requested by Norm Pattis in connection with Connecticut trial relating to financial condition of FSS, and, to be used with corporate representative B. Paz (2.0)	2.00	\$850.00	\$1,700.00
09/05/2022	KSL	Litigation: Follow up on gathering data for preference demand on payments made to Bankston and Connecticut Plaintiffs counsel, if any (1.0)	1.00	\$850.00	\$850.00
09/05/2022	KSL	Plan and Disclosure Statement: Study facts and conclusions from the Logistics Giving case and email S. Lemmon on plan concept re potential subordination of any allowed unsecured portion of asserted PQPR claim (2.5).	2.50	\$850.00	\$2,125.00
09/05/2022	KSL	Business Operations: Email review of bitcoin account issue by Marc Schwartz (.2)	0.20	\$850.00	\$170.00

09/06/2022	RJS	Claims Administration and Objections: Attention to K. Lee email re claims remaining against InfoW also against FSS and respond to same.	0.10	\$625.00	\$62.50
09/06/2022	RJS	Case Administration: Preliminary research re motion to appoint tort claimant committee (.3); attend daily status conference (.9); further research, outline, and begin drafting response to motion to appoint tort claimant committee (5.1).	6.30	\$625.00	\$3,937.50
09/06/2022	RJS	Litigation: Call with S. Lemmon, S. Jordan, K. Lee, and R. Battaglia re discovery matters.	1.50	\$625.00	\$937.50
09/06/2022	KSL	Fee/Employment Applications: Handle emails inquiring into recovery of out-of-pocket expenses for Pattis & Smith LLP and review of files to determine whether FSS should pay (.5)	0.50	\$850.00	\$425.00
09/06/2022	KSL	Litigation: Respond to requests from Connecticut counsel for affidavits relating to certain contentions made which are not accurate re: management agreement between FSS and PQPR, and other statements (2.0); review status of discovery and outstanding issues between Plaintiffs and Debtor with emails from J. Martin and R. Battaglia (1.0); respond to requests for information on previous cases and appearances by Connecticut counsel on disciplinary matters (2.0).	5.00	\$850.00	\$4,250.00
09/06/2022	KSL	Case Administration: Prepare for daily call with draft agenda (1.0); daily FSS call with CRO and counsel (1.0)	2.00	\$850.00	\$1,700.00
09/06/2022	RJS	Litigation: Emails with K. Lee re transcripts attached as exhibits to TCC motion (.2); draft email to J. Martin and R. Chapple re same (.1); send M. Schwartz drafts of written discovery requests re TCC motion (.1).	0.40	\$625.00	\$250.00
09/07/2022	RJS	Case Administration: Attend daily status call re matter (.4); outline factual background section for response to motion for TCC/removal of DIP (1.9).	2.30	\$625.00	\$1,437.50
09/07/2022	RJS	Meetings of Creditors: Listen and take notes re 341 meeting of creditors.	1.80	\$625.00	\$1,125.00
09/07/2022	KSL	Meetings of Creditors: Prepare M. Schwartz for 341 Meeting of Creditors (1.0); attend 341 Meeting of Creditors and represent Debtor through CRO at same (2.0).	3.00	\$850.00	\$2,550.00
09/08/2022	KSL	Litigation: Work on revising affidavit drafts for Norm Pattis from employees of FSS (1.0); edit and revise affidavit of Blake Roddy (.5); continue to review and revise affidavits relating to Google Analytics, analyze state court discovery on same and report findings to Marc Schwartz and counsel and discuss same with Norm Pattis (2.0); review same with Norm Pattis, Blake	5.00	\$850.00	\$4,250.00

Roddy and R.Shannon and update affidavit (1.5).					
09/08/2022	RJS	Litigation: Attention to request from N. Pattis/M. Schwartz re "management agreement" referenced in testimony in Connecticut Litigation and respond to same (.2); attention and respond to various emails re same (.2); draft affidavit re same for M. Schwartz re same for use in Connecticut Litigation (1.5); attention to emails re "Google Analytics" issue (.1); attend calls with N. Pattis, FSS employee Roddy, K. Lee, and M. Schwartz re same (.7); prepare draft Roddy affidavit providing the "Google Analytics" to Connecticut Plaintiffs (2.8); send same to Roddy and N. Pattis for review and editing (.1).	5.60	\$625.00	\$3,500.00
09/08/2022	KSL	Case Administration: Prepare for and attend daily FSS call with CRO and counsel (1.0); t/c with R. Battaglia on new developments in case (.5).	1.00	\$850.00	\$850.00
09/09/2022	KSL	Case Administration: Handle connection issue pointed out by M. Haselden as to A. Reynal and B. Shulse (.5); review emails relating to consignment agreement with [REDACTED] (.5); review discovery against PQPR (.5); review Shurwest case and facts (.5); analyze on FSS call status of case matters and division of responsibility (.5)	2.00	\$850.00	\$1,700.00
09/09/2022	RJS	Litigation: Attention to court setting hearing re PQPR/ Plaintiff discovery dispute and internal emails re same (.1); respond to same that able to attend hearing instead of Plan discussions in Austin (.1); research issues re appointing TCC and removal of DIP in subchapter v cases (3.7).	3.90	\$625.00	\$2,437.50
09/10/2022	KSL	Litigation: Review emails and schedules to determine how to staff hearing on Monday relating to PQPR discovery dispute, and, role of FSS (.5); handle subsidiary issues relating to Motion to Compel Discovery Against PQPR and effect on litigation overall (.5)	1.00	\$850.00	\$850.00
09/10/2022	KSL	Plan and Disclosure Statement: Continue to analyze with FSS Team issues affecting Debtor from discovery schedule and hearings on motions and plan formulation to determine strategy on how to approach creditors on plan concepts (2.0).	2.00	\$850.00	\$1,700.00
09/11/2022	KSL	Fee/Employment Applications: Handle retainer issue for special counsel Reynal (.3).	0.30	\$850.00	\$255.00
09/11/2022	KSL	Case Administration: Researching Young on removal of debtor in possession and procedure to handle (1.0); analyze Neosho case denying removal (.5); study and analyze secondary materials on standards for "cause" as to removal of debtor in possession, and, whether a party other than a debtor may propose a plan and what alternatives are available to court and creditors (1.5); review emails from S. Lemmon re: David Jones -Marc	3.50	\$850.00	\$2,975.00

Schwartz dialogue (.5)					
09/11/2022	KSL	Litigation: Handle issues relating to comments requested by Norm Pattis as to strategic concerns on Connecticut trial (1.5)	1.50	\$850.00	\$1,275.00
09/12/2022	KSL	Plan and Disclosure Statement: Continue to gather and collect data needed to discuss with Marc Schwartz and Ray Battaglia going forward on tasks requested by them, including outlining plan issues, plan drafting and conceptualizing disposable income, and whether avoidance actions are above or below the disposable income line (3.0)	3.00	\$850.00	\$2,550.00
09/12/2022	RJS	Fee/Employment Objections: Attention to and analyze objections to employment applications of Schwartz and Associates and S&L.	3.50	\$625.00	\$2,187.50
09/13/2022	KSL	Plan and Disclosure Statement: Travel to and from Austin, Texas for meetings with client representatives Shulse, Schwartz and Battaglia to discuss business and operational issues (7)(billed at 1/2 travel time 3.5); o/c in Austin to review data on sales and operational issues and discuss next steps, including assignments and plan drafting (2.0)	5.50	\$850.00	\$4,675.00
09/13/2022	RJS	Case Administration: Prepare for and attend hearing re PQPR/Plaintiffs discovery dispute and update Court about status report and scheduling hearings on U.S. Trustee Objections to employment applications (1.0); draft status report for subchapter v case (.9); revise same based on conversations with M. Schwartz, K. Lee, and R. Battaglia based on discussions in Austin (.3); file same (.2).	2.40	\$625.00	\$1,500.00
09/13/2022	RJS	Fee/Employment Objections: Provide relevant documents to U.S. Trustee re objections to applications to employ S&L (.5); research into U.S. Trustee objections to applications to employ S&L and CRO (2.1).	2.60	\$625.00	\$1,625.00
09/14/2022	RJS	Fee/Employment Applications: Prepare reply to S&L application to employ and gather relevant documents.	11.20	\$625.00	\$7,000.00
09/15/2022	RJS	Fee/Employment Objections: Draft reply to objection to S&L employment application (8.5); gather relevant documents for inclusion on W&E List (1.0); draft W&E list (.6).	10.10	\$625.00	\$6,312.50
09/16/2022	RJS	Fee/Employment Objections: Send H. Nguyen documents related to U.S. Trustee objection to Schwartz Employment Application (.3); finalize W&E list and exhibits re same (1.0); file same (.3); finalize reply re U.S. Trustee objection to S&L employment application (2.5); file and serve same (.2); outline witness questions (3.4).	7.70	\$625.00	\$4,812.50

09/17/2022	KSL	Fee/Employment Objections: Continue to prepare for hearing on Application to Retain Schwartz Associates (4.0); review and revise pleadings and continue to prepare for hearings on Application to Retain S&L as bankruptcy counsel (4.0)	8.00	\$850.00	\$6,800.00
09/17/2022	RJS	Fee/Employment Objections: Provide comments on reply to U.S. Trustee objection to Schwartz application to employ (3.0); revise witness questions re same (1.2); call with J. Martin re Plaintiffs' joinder and contemplated plan provisions (.4).	4.60	\$625.00	\$2,875.00
09/18/2022	KSL	Fee/Employment Objections: Prepare for hearings on Application to Retain Schwartz and to Retain Shannon & Lee LLP (4.0); continue to edit and revise Reply for Schwartz in connection with US Trustee Objection to Retention (4.5)	8.50	\$850.00	\$7,225.00
09/18/2022	RJS	Fee/Employment Objections: Proofread and comment on reply to U.S. Trustee Objection to Schwartz objection (5.0); file and serve final version of same (.3).	5.30	\$625.00	\$3,312.50
09/19/2022	KSL	Fee/Employment Objections: Prepare for hearing on Applications to Retain CRO and Shannon & Lee with witness preparation and exhibits review (5.0); handle further email and document review to determine exact date of Engagement Letter for Marc Schwartz (2.0); analyze cases and legal arguments made in Reply and cases in connection with hearing on Application (4.0)	12.00	\$850.00	\$10,200.00
09/19/2022	RJS	Fee/Employment Objections: Prepare for hearing on U.S. Trustee objection to S&L and CRO employment applications.	5.00	\$625.00	\$3,125.00
09/20/2022	KSL	Case Administration: Prepare for hearing on Status Report to the Court on Administration of FSS case (.5).	0.50	\$850.00	\$425.00
09/20/2022	KSL	Fee/Employment Objections: Continue to prepare for hearing on Application to Retain CRO and S&L as co-counsel for FSS (4.0); attend hearing on Application, testify at hearing on Application and examine witnesses at hearing on Application (6.0).	10.00	\$850.00	\$8,500.00
09/20/2022	RJS	Fee/Employment Objections: Prepare and file supplemental W&E list for hearing on U.S. Trustee objection to application to employ S&L and CRO (.8); prepare for (2.0) and attend (6.5) hearing on employment applications.	8.80	\$625.00	\$5,500.00

**Quantity Subtotal** **523.1**

**Services Subtotal** **\$382,671.25**

## Expenses

Type	Date	Description	Quantity	Rate	Total
------	------	-------------	----------	------	-------

Expense	07/29/2022	Service of Filings: Printing and mailing of Utility Motion (printing and service through vendor).	1.00	\$87.26	\$87.26
Expense	07/29/2022	Service of Filings: Printing and mailing of Heslin/Lewis Stay Motion, Cash Collateral Motion, Critical Vendor Motion, and Motion to Extend time for Schedules and Statements (printing and service through vendor).	1.00	\$176.88	\$176.88
Expense	07/29/2022	Filing Fees: Chapter 11 Filing Fee (paid by S&L though filed through R. Battaglia ECF at his direction).	1.00	\$1,738.00	\$1,738.00
Expense	07/31/2022	Copy Costs: Copy two original sets of proposed Exhibits to share with Marc Schwartz at La Madeleine meeting on Sunday in Preparation for Hearing on Motion to Lift Stay.	1.00	\$50.23	\$50.23
Expense	07/31/2022	Copy Costs: Rush order binding of 6 Exhibit books for Hearing on Motion to Lift Stay in Favor of Heslin/Lewis on 8.1.22.	1.00	\$221.90	\$221.90
Expense	08/08/2022	RJS flight to Connecticut for hearing on motion to remand for Connecticut Litigation and return to Houston, TX, on United Airlines (Economy Plus).	1.00	\$861.20	\$861.20
Expense	08/09/2022	RJS charge for internet access on 8/9/22 flight from Houston, TX to Hartford, CT	1.00	\$10.00	\$10.00
Expense	08/10/2022	Rental Car: RJS car rental to travel from Windsor Locks, CT/Bradley Int'l Airport to Bridgeport, CT for hearing on Connecticut Plaintiffs' motion to remand.	1.00	\$167.25	\$167.25
Expense	08/11/2022	Hotel: RJS hotel, taxes, and 1 day internet charge for scheduled in-person hearing before Connecticut Bankruptcy Court related to removed Connecticut Litigation (Stay 8/9/22 to 8/11/22).	1.00	\$394.70	\$394.70
Expense	08/11/2022	RJS charge for Internet access on return flight on 8/11/22.	1.00	\$10.00	\$10.00
Expense	08/24/2022	Service of Filings: Service of Pleadings (printing and postage through vendor).	1.00	\$259.00	\$259.00
Expense	09/03/2022	Form of Consignment Agreement to use with [REDACTED] Group.	1.00	\$29.99	\$29.99
Expense	09/06/2022	Printing copies of Exhibits to Motion to Appoint Tort Committee.	1.00	\$54.65	\$54.65
Expense	09/08/2022	Service of Filings: Service of pleadings on retaining special counsel (printing and postage through vendor).	1.00	\$124.20	\$124.20
Expense	09/13/2022	Mileage: KSL travel to and from Austin after meetings with company and professionals re plan of reorganization.	1.00	\$202.10	\$202.10
Expense	09/15/2022	Service of Filings: Service of Pleadings (printing and postage through vendor).	1.00	\$98.19	\$98.19

Expense	09/18/2022	Printing copies of exhibits for hearings on Application	1.00	\$49.08	\$49.08
Expense	09/19/2022	Binders and dividers for Exhibit Binders for Trial	1.00	\$109.02	\$109.02
Expense	09/19/2022	Copy costs of exhibits 3X for hearing on Application	1.00	\$375.95	\$375.95
<b>Expenses Subtotal</b>				<b>\$5,019.60</b>	

Time Keeper	Position	Hours	Rate	Total
Kyung Lee	Attorney	263.4	\$850.00	\$223,890.00
R. J. Shannon	Attorney	248.4	\$625.00	\$155,250.00
R. J. Shannon	Attorney	11.3	\$312.50	\$3,531.25
<b>Quantity Total</b>				<b>523.1</b>
<b>Subtotal</b>				<b>\$387,690.85</b>
<b>Total</b>				<b>\$387,690.85</b>

## Detailed Statement of Account

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
16	11/06/2022	\$387,690.85	\$0.00	\$387,690.85
<b>Outstanding Balance</b>				<b>\$387,690.85</b>
<b>Total Amount Outstanding</b>				<b>\$387,690.85</b>

### IOLTA Trust Account

Date	Type	Description	Matter	Receipts	Payments	Balance
<b>IOLTA Trust Account Balance</b>					<b>\$50,822.68</b>	